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MEMO ENDORSED

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November 9, 2020

VIA ECF

The Hon. Edgardo Ramos
United States District Court
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: **Joanna Pedroza v. Ralph Lauren Corp.**
No. 19-cv-08639 (ER)

Dear Judge Ramos:

We represent Plaintiff Joanna Pedroza ("Plaintiff") in the above-referenced employment action against Defendant Ralph Lauren Corp. ("Defendant"). Pursuant to this Court's Individual Practice Rules 1(E), we write now to respectfully request a two-week adjournment of the November 10, 2020 pre-motion conference on Plaintiff's request to file an amended complaint, to assert claims under New Jersey law [Dkt. No. 57, 54]. Counsel for Defendant, Matthew Steinberg, Esq., consents to Plaintiff's request. Both parties are available for a pre-motion conference on November 23 and 24, 2020, or on any subsequent date that is convenient for the Court.

This is the Plaintiff's second request for an adjournment of the pre-motion conference. The prior request was granted on October 30, 2020. [Dkt. No. 59].

Plaintiff is respectfully making this request because the parties have made significant progress in their settlement discussions and would benefit from additional time to continue such discussions before potentially commencing motion practice on Plaintiff's proposed amended complaint.

Based on the foregoing, we respectfully request a two-week adjournment of the November 10, 2020 pre-motion conference. Both parties are available for a pre-motion conference on November 23 and 24, 2020, or on any subsequent date that is convenient for the Court.

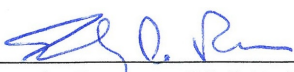
We thank the Court for its attention to this matter.

Respectfully submitted,


Chaya M. Gourarie, Esq.

Plaintiff's request is granted. The pre-motion conference is adjourned to December 2, 2020 at 11:30 am. The parties are directed to dial (877) 411-9748 at that time and enter access code 3029857, followed by the pound (#) key. The Clerk of Court is respectfully directed to terminate the motion. Doc. 61.

So ordered.


Edgardo Ramos, U.S.D.J
Dated: 11/9/2020
New York, New York